

1 SUE FAHAMI
Acting United States Attorney
2 Nevada Bar No. 5634
STEVEN J. ROSE
3 Assistant United States Attorney
Nevada Bar No. 13575
4 501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
5 (702) 388-6336
Steven.Rose@usdoj.gov
6 *Attorneys for the United States of America*

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 United States of America,
10

11 Plaintiff,

12 v.

13 CLIFFORD SANCHEZ,

14 Defendant.
15

2:23-cr-00194-JCM-MDC

**Stipulation and Order to Continue
Response Deadline on Motion to
Suppress Statements and Evidence
(Second Request)**

16 It is hereby stipulated and agreed, by and between SUE FAHAMI, Acting United
17 States Attorney, and Steven J. Rose, Assistant United States Attorney, counsel for the United
18 States of America, Rene L. Valladares, Federal Public Defender, and JOANNE
19 DIAMOND, Assistant Federal Public Defender, counsel for defendant Clifford Sanchez,
20 that the deadline for the Government's response to defendant's Motion to Suppress (ECF
21 No. 43) scheduled for February 28, 2025, be continued to March 28, 2025. In support of this
22 request, the parties state the following:

23 1. On May 2, 2023, a Complaint was filed charging defendant with Distribution
24

1 of Child Pornography. ECF No. 1.

2 2. On October 17, 2023, a grand jury returned an indictment charging defendant
3 with Coercion and Enticement, Distribution of Child Pornography, and Possession of Child
4 Pornography. ECF No. 22.

5 3. Following several continuances, trial is currently set for April 21, 2025. ECF
6 No. 42. Motions were due on January 31, 2025, and responses by February 28, 2025. *Id.*

7 4. On January 31, 2025, defendant filed a Motion to Suppress Statements and
8 Evidence. ECF No. 43.

9 5. On February 11, 2025, the government filed a stipulation to continue the
10 response deadline for the motion to suppress. ECF No. 47.

11 6. On February 14, 2025, the court held a hearing on the stipulation and
12 expressed some concern about having sufficient time to consider and decide the motion
13 before the then-scheduled trial. After the parties informed the Court that the trial was likely
14 to be continued by way of stipulation, the continued the response deadline. ECF Nos. 49,
15 50.

16 7. On February 24, 2025, the parties filed a stipulation to continue the trial,
17 asking that the trial be set in October 2025, to accommodate the schedules of all parties and
18 witnesses. ECF No. 51.

19 8. In light of the time before trial and Government counsel's work obligations
20 and work travel, counsel for the Government asked counsel for defendant for an extension
21 of the deadline to respond to the motion, and counsel for defendant graciously agreed. The
22 parties stipulate that the Government's response to the Motion will be set for Friday, March
23 28, 2025. This additional time also accounts for the exercise of due diligence, in the interest
24

of justice, and is not for the purposes of delay.

Respectfully submitted this 26th day of February 2025.

SUE FAHAMI
Acting United States Attorney

/s/Steven J. Rose
STEVEN J. ROSE
Assistant United States Attorney

/s/Heidi Ojeda
HEIDI OJEDA
Assistant Federal Public Defender
Counsel for Defendant,
CLIFFORD SANCHEZ

IT IS SO ORDERED.

Dated: 2-26-25



HON. MAXIMILIANO D. COUVILLIER, III.
UNITED STATES MAGISTRATE JUDGE